

Santen Code of Practice

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The Santen Code of Practice presents the specific norms of conduct to be observed in connection with our business activities, here referring to compliance with laws and regulations as well as how those who work in the Santen Group are required to act, based on the Fundamental Philosophy. It is also specified as the behavior guidelines in connection with our corporate activities in the Basic Principles for Internal Control (system established to ensure proper business) determined by Santen's Board of Directors.

The Code of Practice comprises the Declaration of Corporate Behavior and the Code of Conduct. The Declaration of Corporate Behavior expresses what we at Santen intend to do regarding customers, employee responsibility, and society. The Code of Conduct orients decision-making with regard to specific actions.

Declaration of Corporate Behavior

I. Building Trust with Customers

1. We pursue timely and efficient research and development to produce useful and innovative pharmaceuticals and related products that our customers desire in order to maintain and enhance people's health.
2. We efficiently and stably provide high-quality pharmaceuticals and related products with excellent efficacy and safety in which our customers can trust.
3. We promptly provide accurate and reliable information on quality, efficacy, safety and other matters of pharmaceuticals and related products as part of our fair sales and marketing activities, in order to promote the optimal use of pharmaceuticals and related products.

II. Promoting Employee Responsibility and Growth

1. We create a safe and comfortable workplace environment that is also proactive, humane and enriching, by pursuing self-improvement, fulfilling our expected roles, and respecting individual rights, personalities and characteristics.
2. We protect, manage and effectively utilize the Company's assets, funds and information with full recognition of their value and according to the applicable rules.
3. We promote mutual understanding with our stakeholders and build and maintain fair, transparent and free relationships with them that merit society's trust.

III. Maintaining Harmony with Society

1. We protect nature and actively engage in global environmental protection.
2. As a responsible corporate citizen, we engage in activities that contribute to society, promote dialogue, and progress in harmony with society.

Code of Conduct

I. Building Trust with Customers

1. We pursue timely and efficient research and development to produce useful and innovative pharmaceuticals and related products that our customers desire in order to maintain and enhance people's health.

1-1 Research and development

We conduct research and development concerning pharmaceuticals and related products while compiling accurate and highly reliable data on efficacy, safety and other matters in full consideration of life ethics.

We conduct animal testing only in absolutely necessary cases from the standpoint of animal welfare, using as few animals as possible, while at the same time devising ways to mitigate animal suffering and developing alternative testing methods.

1-2 Clinical study

We conduct clinical studies while respecting the human rights of the participating subjects and giving full consideration to safety.

We assess the results of clinical studies objectively and with the greatest scientific rigidity.

1-3 Post-marketing study

Upon manufacturing and marketing our products, we collect, evaluate and analyze scientifically verified information on their quality, efficacy and safety from domestic and international sources, and devise necessary measures to prevent the emergence or spread of potential health hazards and to promote optimal use.

I. Building Trust with Customers

2. We efficiently and stably provide high-quality pharmaceuticals and related products with excellent efficacy and safety in which our customers can trust.

2-1 Manufacturing

We conduct sufficient manufacturing and quality control throughout the whole manufacturing process to ensure an efficient and stable supply of highly reliable quality pharmaceuticals and related products.

In the case of a quality problem with a pharmaceutical or related product, we promptly conduct a fact-finding investigation to detect the causes and devise necessary measures.

2-2 Quality assurance

We assure high levels of quality, efficacy and safety in our pharmaceuticals and related products, backed by the latest science and technology.

2-3 Distribution

We assure the quality of pharmaceuticals and related products during distribution.

We conduct exportation and importation appropriately in compliance with applicable domestic and international laws and regulations.

I. Building Trust with Customers

3. We promptly provide accurate and reliable information on quality, efficacy, safety and other matters of pharmaceuticals and related products as part of our fair sales and marketing activities, in order to promote the optimal use of pharmaceuticals and related products

3-1 Promotion

We conduct sales and marketing activities in a transparent and fair manner, in compliance with the Fair Competition Code, which is the pharmaceutical industry's voluntary rules, and the Company's own Promotion Code and other relevant standards.

3-2 Safety control of pharmaceuticals and related products

We obtain information concerning the safety of pharmaceuticals and related products as rapidly as possible, to prevent the spread of undesirable side-effects and other forms of damage.

3-3 Dissemination of information on pharmaceuticals and related products

We rapidly disseminate accurate scientifically verified information on the quality, efficacy and safety of pharmaceuticals and related products.

3-4 Advertising and public announcements

We conduct advertising and public announcements in a creative and appropriate manner that does not mislead customers and the general public.

II. Promoting Employee Responsibility and Growth

1. We create a safe and comfortable workplace environment that is also proactive, humane and enriching, by pursuing self-improvement, fulfilling our expected roles, and respecting individual rights, personalities and characteristics.

1-1 Respect for individuals

We do not engage in discrimination against or harassment of individuals based on their nationality, race, skin color, religion, creed, sexual orientation, age, education, family background, place of birth, disability, health problems, social position, etc.

We respect individual personalities and do not engage in sexual, moral or any other kind of harassment in the workplace.

1-2 Safe, comfortable and motivating working environment

We create an efficient and motivating workplace environment and ensure humane working conditions in compliance with applicable laws, regulations, and internal and external rules concerning labor, health and safety, and in consideration of employee safety and health.

We respect the Road Traffic Act and other traffic rules and driving safety.

1-3 Work and evaluation

We perform our work with full understanding of the roles and functions expected of us in consideration of the Company's business objectives and goals, while continuously acquiring and improving specialized knowledge and skills required for the work.

We evaluate work performance and personnel in a fair and appropriate manner based on clearly indicated criteria.

II. Promoting Employee Responsibility and Growth

2. We protect, manage and effectively utilize the Company's assets, funds and information with full recognition of their value and according to applicable rules.

2-1 Protection of assets

We use the Company's assets such as equipment, machinery, instruments, systems and other supplies solely for the Company's business activities and take care in order to prevent damage, theft or misuse.

2-2 Utilization of funds

We use the Company's funds in the most advantageous ways to the Company, always in consideration of cost effectiveness, after obtaining approval for expenditure by following the procedure set forth in accordance with the Company's Settlement Regulations.

2-3 Confidentiality

We protect the Company's important information with care and caution, and manage it according to applicable in-house rules.

We use technical and scientific information concerning products, and exclusively held company information such as business and sales plans, profit and other financial data solely in connection with the Company's business activities.

We will not publicly disclose, use or transfer to a third party such information without the Company's permission while employed by or after resignation or retirement from the Company.

2-4 Respect for third-party confidential information

We respect confidential information of any third party, including other companies and organizations, and do not illegally acquire, use or publicly display such information.

We do not use or disclose within the Company third-party confidential information acquired before joining the Company, while on loan to other companies, or on other occasions.

2-5 Protection of personal information

We protect, use and manage personal information of health care professionals, consumers, patients, shareholders, trade customers and suppliers, and Company directors and employees that is necessary for the Company's business activities in compliance with the applicable laws and external and internal rules.

2-6 Handling of intellectual properties

We recognize the importance of intellectual property (IP) rights and strive to protect research and development results by registering them in the form of IP rights.

We handle inventions by Company employees in accordance with regulations voluntarily established beforehand.

We do not violate third-party intellectual property rights.

2-7 Accurate recording and reporting

We conduct appropriate reporting, communication and consultation that are necessary for the Company's business activities.

We record and report accurate and truthful information on financial, accounting and other business-related matters.

We fulfill our tax obligations and conduct licensing, reporting, notification and other formalities due to competent authorities in an appropriate and accurate manner, without falsification or misrepresentation.

II. Promoting Employee Responsibility and Growth

3. We promote mutual understanding with our stakeholders and build and maintain fair, transparent and free relationships with them that merit society's trust.

3-1 Appropriate treatment

We do not offer or receive, in connection with the Company's business activities, money, gifts or entertainment that exceeds the range considered generally acceptable by social norms.

3-2 Prohibition of bribery and corruption

We do not engage in any conduct regarded as bribery or corruption, whether directly or through a third party, that would violate the applicable laws and regulations of the relevant country, including those applicable to other countries, such as the UK Bribery Act or the US Foreign Corrupt Practices Act (FCPA).

3-3 Sound relationships with trade partners

We conduct business transactions with our trade partners in sufficient consultation while respecting their positions, rights and interests, and in compliance with relevant laws, regulations and in-house rules.

We select and evaluate suppliers based on rational criteria covering such aspects as quality, cost, delivery, service, managerial reliability and social responsibility.

We do not accept favors from trade partners in exchange for unfair preferential consideration of them.

3-4 Appropriate outsourcing

We outsource consultancy, expert advice and other services to health care professionals and other external specialists by always entering into an agreement with them, with a written contract signed and fees proportional to the service provided.

We pay the fees for the services provided by health care professionals in compliance with the applicable laws and regulations of the relevant country and the pharmaceutical industry's rules, and disclose information on the service fees in an appropriate manner.

3-5 Prevention of insider trading

We comply with laws, regulations and in-house rules concerning insider trading, and refrain from purchasing or selling stocks of the Company or its trading partners under advantageous conditions based on in-house availability of important information that is unknown to the general

public.

We do not communicate to our families, acquaintances or friends important information relating to the Company that may influence the course of the Company's stock prices.

3-6 Avoidance of conflict of interest

We take special care to avoid any conflict of interest between the Company and individual Company directors or employees who have a spouse, family member or near relative employed by a rival company, trade partner or trade customer.

III. Maintaining Harmony with Society

1. We protect nature and actively engage in global environmental protection.

1-1 Global environmental protection

We strive to promote the efficient use of resources and energy and reduce waste, based on the understanding that protecting nature and giving consideration to the global environment are basic corporate social responsibilities.

1-2 Efforts to overcome environmental challenges

We make active efforts to contribute to the conservation of biodiversity and to overcome other national and international environmental challenges.

III. Maintaining Harmony with Society

2. As a responsible corporate citizen, we engage in activities that contribute to society, promote dialog, and progress in harmony with society.

2-1 Contribution to society

Through the Company's business activities, we contribute to the rationalization of people's medical expenses, the conservation of medical resources, and the advancement of medicine and medical technology, and support research that is necessary for the development of medicine and pharmacology from a global perspective.

As a responsible corporate citizen, we actively engage in activities that contribute to society, while promoting mutual understanding with local communities and residents.

2-2 Communication with society

We actively disclose information on the Company's business activities and continuously improve our communication with stakeholders (customers, consumers, employees, local communities and society, trade partners, shareholders and investors)

We disclose corporate information in an appropriate manner, in addition to business reports and information literature that are published periodically.

2-3 Relationships with antisocial entities and political and governmental bodies

We maintain a resolute attitude toward antisocial entities, which challenge social order and safety and attempt to draw unfair benefits from businesses, and refuse any demands from them.

We maintain sound and normal relationships with political and governmental bodies.

2-4 Observance of international rules

In our global activities, we observe international rules and local laws while respecting local cultures and customs, and ensuring that our business activities contribute to local development.



SANTEN PHARMACEUTICAL CO., LTD.